

Document 33, W. Brad DeBow, Rexburg, ID  
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33-6  
III.C(9) The State of Idaho is telling the DOE on one hand that the liquid SBW must be solidified by 2012, and on the other hand that the only method of accomplishing that feat, the use of the Calcliner, must be halted by June 1, 2000 because of emission requirements. I do not consider this acceptable behavior on the part of my State elected representatives, and so inform them by copy of this letter. The Calcliner has operated for a number of years without a MACT upgrade and is perfectly capable of completing its mission without impacting the environment.

33-7  
VII.D(2) Instead of using this EIS as a vehicle to abrogate the requirement to solidify the liquid waste by 2012, DOE should instead be confronting the issue directly with the State of Idaho. The Calcliner is not an incinerator, by EPA's or any other definition of the word. I have looked at 40 CFR Part 60, et al. NESHAPS Standards, and have two conclusions. The Calcliner does not fit the EPA definition of a Hazardous Waste Combustor, and the emissions requirements would accomplish nothing meaningful in the desert environment where the Calcliner is located. On the other hand, the solidification of the liquid SBW waste by 2012 through the operation of the Calcliner through this period would greatly reduce the risk to the subterranean environment. It is a shame our State bureaucrats seem unable to grasp these simple facts.

33-10  
III.C(6) To elaborate on one area of the NESHAPS Standards the State bureaucrats are attempting to impose on the Calcliner, on page 52832 of this document, the MACT rules are established for three source categories, namely: Hazardous waste burning incinerators, hazardous waste burning cement kilns, and hazardous waste burning lightweight aggregate kilns. These three source categories are referred to collectively as hazardous waste combustors in the EPA regulations. The NWCF Calcliner fits none of these categories. It is not a combustor, it is a Calcliner. The Calcliner is a much higher technology facility than the commercial waste combustors that may be put up by commercial industries and utilities. A reading of the EPA regulations makes it very clear they were directed at the low technology units put up by commercial industrial plants and city utilities.

33-11  
III.C(5) To further support these facts, I would like to reference you to an EPA document. EPA530-R-97-057 PB98-108 129, November, 1997 is a Hotline Training Module for EPA hotline phone specialists on incineration regulations and definitions. In this document, incineration is defined as a technology to destroy hazardous waste. the Calcliner certainly does not destroy the waste, but converts it from liquid to solid state.

33-12  
III.C(6) Another EPA document defining incinerators is the Final Technical Support Document for HWCMACT Standards, July, 1999. This document has a detailed description of incinerators that is very clear does not include the NWCF Calcliner process. As an example, in its definition of a fluidized bed incinerator it describes how the bed media acts to scrub the waste particles, exposing fresh surface by the abrasion process which encourages rapid combustion of the waste. The Calcliner process can be described as the opposite of that, where the waste particles are encouraged to adhere to the bed material and are not combusted, but carried off as waste transformed from liquid to solid.

33-13  
III.C(4) The DOE must face this problem directly with the State and obtain concurrence for the continued operation of the Calcliner beyond June 1, 2000.

Very truly yours,

*W. Brad DeBow*  
W. Brad DeBow

Document 34, Tri-City Industrial Development Council (Sam Volpentest), Kennewick, WA  
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HLW & FD

EIS PROJECT - (AR) PF

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TRI-CITY INDUSTRIAL DEVELOPMENT COUNCIL

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February 28, 2000

Mr. Thomas L. Wichmann, Document Manager  
U.S. DOE, Idaho Operations Office  
850 Energy Drive, MS 1108  
Idaho Falls, ID 83401-1563

Public Comments Regarding  
Idaho HLW & FD EIS

Dear Mr. Wichmann:

We are submitting herewith a copy of our testimony which was presented at the February 24, 2000 public hearing in Pasco, WA. This submittal is for record purposes and contains several minor editorial corrections from the public comments.

Very truly yours,

*Sam Volpentest*  
Sam Volpentest  
Executive Vice President



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TRI-CITY INDUSTRIAL DEVELOPMENT COUNCIL

STATEMENT PREPARED FOR  
DEPARTMENT OF ENERGY PUBLIC HEARING  
ON DRAFT EIS REGARDING  
IDAHO HIGH LEVEL WASTE AND FACILITIES DISPOSITION  
PASCO, WASHINGTON  
FEBRUARY 24, 2000

The Tri-City Industrial Development Council (TRIDEC) is composed of over 350 dues paying individuals, organizations, and firms having an interest in the economic vitality and growth of the Tri-Cities area. We have been designated by the Department of Energy as the "one voice" spokesman for the Tri-Cities on economic development issues. We have a consistent record of interest in and support for the expeditious cleanup and restoration of the Hanford site and the utilization of site for economic diversification. We appreciate the opportunity to present the views of our organization on this draft EIS.

- 34-1  
11.E(5) [The possible utilization of the Hanford Waste Vitrification Plant for the processing of high level fuel processing wastes at Hanford could have a significant impact on the Hanford cleanup program. Based on currently available preliminary information, the use of the Hanford vitrification plant for processing and vitrification of the Idaho high level wastes would provide significant cost savings to the Department of Energy over other realistic alternatives. The environmental impacts of this alternative appear to be equivalent to or less than those of the other alternatives.]
- 34-2  
11.E(4) [However, this alternative has not been studied in sufficient depth to support a firm position for or against it at this time. If the use of the Hanford vitrification plant for the processing of the Idaho High Level Wastes is to be considered further a more detailed Environmental Impact Analysis of this alternative must be prepared and reviewed by the public including the State of Washington agencies having an interest in this subject. In the preparation of this analysis there are several considerations which must be included in the evaluation.]
- 34-3  
11.E(4)
- 34-4  
11.A(2) [The Hanford Waste Vitrification Plant must be adequately funded, completed, and in full operation before any consideration can be given to the processing of off site wastes.]
- 34-5  
11.E(2)
- 34-7  
11.E(5) [The processing of Idaho wastes cannot delay or interfere with the planned or accelerated processing of Hanford wastes.]
- 34-8  
VIII.1 (2) [Consideration must be given to the impact that additions to the plant will have on local governmental services, police, fire, roads, schools, etc..]

- 34-9  
11.E(6) [Any offsite wastes which are processed or vitrified in the plant must be returned to the sender or to a national repository. Interim or permanent disposal of the wastes at Hanford is not acceptable.]
- 34-10  
11.E(3) [Full funding for all transportation, processing, and storage costs must be provided as an added increment to Hanford Environmental Management program funding.]
- 34-11  
VIII.H(3) [Consideration must be given to local environmental impacts resulting from the transportation and processing of the Idaho wastes.]
- 34-12  
VIII.H(3) [Offsite transportation corridor safety, environmental impacts, and traffic issues must be thoroughly reviewed in cooperation with local and tribal governments. Provision must be made to alleviate any additional costs which may be incurred by local and state government agencies.]
- 34-13  
11.E(3)
- 34-14  
11.E(4) We believe that these issues are reasonable requirements and provide a bottom line basis for evaluation of the importation of high level wastes to Hanford for processing and vitrification. In view of the potential significant savings from the Hanford alternative, that would accrue to the Department, as compared to other feasible alternatives, this alternative should be given a more comprehensive evaluation than is currently available.]

Thank you for the opportunity to present our views on this subject.